

Proceeding: In the Matter of 1998 Biennial Regulatory Review -- Amendment of Part of the ☒ Record 1 of 1

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This correspondent writes as an active amateur radio operator of 35 years' experience, holding an Advanced Class license since 1970. I am also a physician, a Child and Adolescent Psychiatrist well-regarded in my field, a medical school professor and administrator, a specialty board examiner and examination writer, and the author of over 30 publications, many in my area of special interest, communication and developmental disabilities. As such I will comment first on some general concerns about WT 98-143 and then specifically upon concerns relating to disability waivers for amateur licensure examinations.

In general, I find the restructuring proposal submitted to the Commission by the ARRL in their letter of July 22, 1998 to be preferable to WT 98-143. I suggest that the Commission adopt at least two components of the ARRL proposal in its final rulemaking.

1) An EXPANSION OF HIGH-FREQUENCY RADIOTELEPHONY SUB-BANDS should be undertaken. This would more accurately reflect the current pattern of operations in these bands, and would not jeopardize existing radiotelegraphy operations, given the increased selectivity of modern receivers.

2) If the Novice License is eliminated, the CODE SPEED REQUIREMENT FOR THE GENERAL CLASS LICENSE SHOULD BE REDUCED TO 5 WPM. If the current 13 wpm requirement is maintained, the United States would have the the highest entry-level code speed requirement in the world. This requirement will make it much harder to achieve what I assume is a goal of this NPRM, an increase in activity and in the pool of operators for the high-frequency bands.

This would also constitute a serious obstacle to maintaining telegraphy as a part of amateur radio. New operators, especially young people, would be discouraged from ever beginning operation in this mode by so stringent a requirement. A 5-wpm test would allow new operators to develop their skills in an environment of social support from more experienced operators and increase their speed in a painless fashion. Why does telegraphy matter? I see the value of telegraphy not as a "filter" for potential licensees, nor as a mode with much particular technical value in the 21st century. It is, however, a source of common social experience for amateurs, and so far has greatly contributed to the sense of identity, fraternity, and comity that is most definitely a strength of the amateur service. It can still do so. It is also one of a number of supposedly obsolete activities, such as archery, horsemanship, or calligraphy that, despite their antiquity, still have an inherent value and !

! provide much personal satisfaction. In the case of telegraphy, it costs nothing for the Commission not to discourage it.

As to the issue of disability waivers, I feel I have a special perspective on this matter as an amateur radio operator who is also a professional in my subspecialty. I think it is essential, for many reasons well known, to make amateur radio accessible to persons with disabilities. At the same time I have very strong suspicions that in some cases physicians' certifications have been abused. I have no empirical data to support this suspicion. However, in my own experience I have never met a physician who was not a radio amateur and who knew anything about this issue. I have also never met a physician-amateur who was asked to sign a disability waiver for amateur licensure. What I suspect happens in some cases is that the physician, eager to help a patient and buried in an unimaginable pile of forms to sign, gives a perfunctory nod and signs off. If the Commission wishes to pursue this matter, no doubt some data are needed. A random follow-up survey of waived licensees would b!

! e useful. The process of certification could be rationalized for physicians if the Commission provided a detailed checklist of possible handicapping conditions that would justify a waiver, as part of its form. This whole area could be best addressed by an advisory committee of individuals who are amateur licensees and

also special educators or developmental pediatricians, psychologists, or psychiatrists.

Finally, as an inveterate correspondent with the Commission, I thank you for the opportunity to use this easy electronic mode of response to a NPRM!